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**Admitted Pro Hac Vice*

Counsel for Defendants

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

JENNIFER TILDEN,

Plaintiff,

V.

C. R. BARD, INC.; BARD PERIPHERAL
VASCULAR, INCORPORATED.

Defendants.

CASE NO. 2:19-cv-01571-KJD-BNW

**JOINT STATUS REPORT AND
STIPULATION TO EXTEND STAY
OF DISCOVERY AND PRETRIAL
DEADLINES (THIRD REQUEST)**

The Parties, Plaintiff Jennifer Tilden (“Plaintiff”) and Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Bard”), respectfully submit this Joint Status Report and request, pursuant to Fed. R. Civ. P. 26(c) and (d), that the Court continue the stay of discovery and all pretrial deadlines in this case until March 31, 2020, to allow them time to work out the terms of a settlement agreement they recently reached in this matter.

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1 In support thereof, the Parties state as follows:

2 1. Counsel for Plaintiff Tilden and Defendants Bard have been engaged in good
3 faith settlement discussions in this case since the Court granted the Parties' second request to
4 stay discovery.

5 2. The Parties have resolved this matter in principle, however, they require
6 additional time to complete negotiations on the terms of the settlement.

7 3. Thus, the Parties jointly move this Court for an order staying the case until
8 March 31, 2020 to allow the Parties time to finalize their settlement agreement. This will
9 prevent unnecessary expenditures of the Parties' and judicial resources.

10 4. The relief sought in this motion is not purely for delay, but so that justice may
11 be done.

12 Respectfully submitted this 27th day of February 2020.

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54 IT IS SO ORDERED Attorneys for Defendants

55 DATED: February 28, 2020

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57 BRENDA WEKSLER
58 UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2020, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

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/s/ *Evelyn Escobar-Gaddi*

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